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*Attorneys for Defendants Power
Ventures, Inc. and Steve Vachani*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FACEBOOK, INC.,

Plaintiff,

-against-

POWER VENTURES, INC. d/b/a POWER.COM, a
California corporation; POWER VENTURES, INC.
a Cayman Island Corporation, STEVE VACHANI,
an individual; DOE 1, d/b/a POWER.COM, an
individual and/or business entity of unknown nature;
DOES 2 through 25, inclusive, individuals and/or
business entities of unknown nature,

Defendants.

Case No. 5:08-CV-05780 JW (JCS)

**DECLARATION OF L. TIMOTHY
FISHER PURSUANT TO CIVIL L.R.
79-5(D), IN RESPONSE TO
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. NO. 291)**

1 I, L. Timothy Fisher, declare:

2 1. I am an attorney with the law firm of Bursor & Fisher, P.A. and counsel for
3 Defendants Power Ventures, Inc. ("Power") and Steve Vachani. I make this declaration in
4 response to Facebook Inc.'s Motion for Administrative Relief to File Under Seal, Pursuant to Civil
5 Local Rule 79-5(d) (Dkt. No. 291). I have personal knowledge of the facts set forth in this
6 declaration and, if called as a witness, I could and would testify competently thereto.

7 2. I have reviewed the administrative motion to seal filed by Facebook and listed
8 above. Having reviewed the motion and the documents referenced therein, defendants hereby
9 remove the confidential designation of the following documents:

- 10 • Portions of Facebook's Supplemental Brief Regarding Damages and Liability of
11 Steve Vachani.
- 12 • Portions of the January 9, 2012 Deposition of Defendant Power Ventures, Inc.
13 ("Power") pursuant to Fed. R. Civ. P. 30(b)(6) attached as Exhibit 14 to the
14 Declaration of Monte M.F. Cooper in Support of Facebook's Supplemental Brief
15 Regarding Damages and Liability of Defendant Steve Vachani.
- 16 • Portions of the March 7, 2012 deposition of Defendant Power pursuant to F. R. Civ.
17 P. 30(b)(6) attached as Exhibit 2 to the Declaration of Monte M.F. Cooper in Support
18 of Facebook's Supplemental Brief Regarding Damages and Liability of Defendant
19 Steve Vachani.
- 20 • Exhibit Nos. 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 20, 24, 26, 27, 28, 29, 34,
21 and 36 attached to the Declaration of Monte M.F. Cooper in Support of Facebook's
22 Supplemental Brief Regarding Damages and Liability of Defendant Steve Vachani.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct to the best of my knowledge. Executed this 11th day of April, 2012, at Walnut
25 Creek, California.

26
27 /s/ L. Timothy Fisher

28 L. Timothy Fisher